Pamela A. Reese Therma Tru Corporation 108 Mutzfeld Road Butler, IN 46721-9515

Re: 033-14449-00019

Minor Source Modification to Part 70 Permit 033-7927-00019

Dear Ms. Reese:

Therma Tru Corporation was issued a Part 70 operation permit on November 12, 2001 for a door manufacturing plant located at 108 Mutzfeld Road, Butler, IN 46721-9515. An application to modify the source was received on June 1, 2001. The request was made to add a two-belt sander to the plant. The new belt sander would be controlled by the same baghouse and cyclone as the door machining operation.

Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source: One (1) two-belt sander, known as EU7, with emissions controlled by D2-DC1, exhausting through Stack 20.1.

The following construction conditions are applicable to the proposed project:

#### **General Construction Conditions**

- 1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to <u>any</u> proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Management (OAM).
- 2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
- 3. <u>Effective Date of the Permit</u> Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
- 4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
- 5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.
- 6. Pursuant to 326 IAC 2-7-10.5(I) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

Therma Tru Corporation Page 2 of 2
Butler, IN 46721-9515 033-14449-00019

Permit Reviewer: Allen R. Davidson

The source may begin construction and operation when the minor source modification has been issued. Operating conditions shall be incorporated into the Part 70 operating permit as a minor permit modification in accordance with 326 IAC 2-7-10.5(I)(2) and 326 IAC 2-7-12.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Allen R. Davidson at (800) 451-6027, press 0 and ask for extension 3-5693, or dial (317) 233-5693.

Sincerely,

Original signed by

Paul Dubenetzky, Chief Permits Branch Office of Air Quality

Attachments ARD

cc: File - DeKalb County U.S. EPA, Region V

DeKalb County Health Department
IDEM - Northern Regional Office
Air Compliance Section Inspector - Doyle Houser
Compliance Data Section - Melinda Jones
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

## **PART 70 OPERATING PERMIT** MINOR SOURCE MODIFICATION OFFICE OF AIR QUALITY

## **Therma Tru Corporation** 108 Mutzfeld Road **Butler, Indiana 46721**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T033-7927-00019	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Management	Issuance Date: November 12, 1999

First Significant Source Modification, SSM 033-10998-00019 First Significant Permit Modification, SPM 033-11605-00019 Second Significant Permit Modification SPM 033-11940-00019 Second Significant Source Modification SSM 033-12630-00019 Issuance Date: December 5, 2000 First Administrative Amendment AAT 033-12746-00019

Issuance Date: January 21, 2000 Issuance Date: January 28, 2000 Issuance Date: June 2, 2000 Issuance Date: December 8, 2000

First Minor Source Modification 033-14449-00019	Pages Amended: 5b, 39a, 39b, 39c
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: July 30, 2001

## Page of 44 OP No. T033-7927-00019

## **TABLE OF CONTENTS**

Α	SOUR	<b>SOURCE SUMMARY</b>			
	A.1	General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]			
	A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]			
	A.3	Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]			
	A.4	Part 70 Permit Applicability [326 IAC 2-7-2]			
_	05115	AL CONDITIONS			
В		RAL CONDITIONS			
	B.1	Permit No Defense [326 IAC 2-1-10] [IC 13]			
	B.2	Definitions [326 IAC 2-7-1]			
	B.3	Permit Term [326 IAC 2-7-5(2)]			
	B.4	Enforceability [326 IAC 2-7-7(a)]			
	B.5	Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]			
	B.6	Severability [326 IAC 2-7-5(5)]			
	B.7	Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]			
	B.8	Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]			
	B.9	Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]			
	B.10	Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]			
	B.11	Annual Compliance Certification [326 IAC 2-7-6(5)]			
	B.12	Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)][326 IAC 2-7-6(1)and(6)]			
	B.13	Emergency Provisions [326 IAC 2-7-16]			
	B.14	Permit Shield [326 IAC 2-7-15]			
	B.15	Multiple Exceedances [326 IAC 2-7-5(1)(E)]			
	B.16	Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]			
	B.17	Permit Modification, Reopening, Revocation and Reissuance, or Termination			
	B.18 B.19	Permit Renewal [326 IAC 2-7-4]  Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]			
	B.20	Permit Revision Under Economic Incentives and Other Programs			
	B.21	Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]			
	B.22	Operational Flexibility [326 IAC 2-7-20]			
	B.23	Construction Permit Requirement [326 IAC 2]			
	B.24	Inspection and Entry [326 IAC 2-7-6(2)]			
	B.25	Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]			
	B.26	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]			
	B.27	Enhanced New Source Review [326 IAC 2]			
	B.28	Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]			
	D.20	Oredible Evidence [320 IAO 2-7-3(3)][02 Federal Register 03 13][320 IAO 2-7-0]			
С	SOURCE OPERATION CONDITIONS				
	Emiss	ion Limitations and Standards [326 IAC 2-7-5(1)]			
	C.1	PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]			
	C.2	Particulate Matter Emission Limitations For Processes with Process Weight Rates			
	C.3	Opacity [326 IAC 5-1]			
	C.4	Open Burning [326 IAC 4-1] [IC 13-17-9]			
	C.5	Incineration [326 IAC 4-2] [326 IAC 9-1-2]			
	C.6	Fugitive Dust Emissions [326 IAC 6-4]			
	C.7	Operation of Equipment [326 IAC 2-7-6(6)]			
	C.8	Stack Height [326 IAC 1-7]			
	C.9	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]			
	Testin	g Requirements [326 IAC 2-7-6(1)]			
	C.10	Performance Testing [326 IAC 3-6]			
	•				

	Page	of 44
OP No.	T033-7927	-00019

	Complia	ance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]	
		Compliance Schedule [326 IAC 2-7-6(3)]	
		Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]	
		Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]	
		Monitoring Methods [326 IAC 3]	
	C.15	Pressure Gauge Specifications	
		ive Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]	
	C.16	Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]	
	C.17	Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]	
	C.18	Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5]	
		Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]	
	Record	Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]	
		Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]	
		Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]	
		General Record Keeping Requirements [326 IAC 2-7-5(3)]	
	C.23	General Reporting Requirements [326 IAC 2-7-5(3)(C)]	
		pheric Ozone Protection	
	C.24	Compliance with 40 CFR 82 and 326 IAC 22-1	
D.1		TY OPERATION CONDITIONS - Fiberglass operations (EU1), Door skin gluing	20
	(EU2), F	Flowcoating (EU3)	30
		on Limitations and Standards [326 IAC 2-7-5(1)]	
	D.1.1	Volatile Organic Compounds (VOC) [326 IAC 8-1-6]	
	D.1.2	Volatile Organic Compounds (VOC) [326 IAC 2-2]	
		Volatile Organic Compounds (VOC) [326 IAC 8-2-9]	
		Particulate Matter (PM) [326 IAC 6-3-2(c)]	
		PM and PM <sub>10</sub> [326 IAC 2-2]	
		Preventive Maintenance Plan [326 IAC 2-7-5(13)]	
	Compli	Proc. Determination Beguirements, [226 IAC 2.4.4.41 [226 IAC 2.7.6/4)]	
		ance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]	
		Volatile Organic Compounds (VOC)	
	D.1.8	VOC Emissions	
	Complia	ance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]	
		Particulate Matter (PM)	
	D.1.10	Monitoring	
	Record	Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]	
		Record Keeping Requirements	
		Reporting Requirements	
D.2	FACILIT	TY OPERATION CONDITIONS - Machining (EU4), Calcium Carbonate Silo (EU5)	33
	Emissic	on Limitations and Standards [326 IAC 2-7-5(1)]	
		Particulate Matter (PM) [326 IAC 6-3-2]	
		Preventive Maintenance Plan [326 IAC 2-7-5(13)]	
	Complia	ance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]	
		Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11]	

First Minor Source Modification 033-14449-00019 Amended by: Allen R. Davidson

Therma Tru Corporation Butler, Indiana Permit Reviewer: J. Patterson

	Page	of 44
OP No.	T033-7927	-00019

	Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]  D.2.4 Particulate Matter (PM)  D.2.5 Visible Emissions Notations  D.2.6 Parametric Monitoring  D.2.7 Broken Bag or Failure Detection
	Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19] D.2.8 Record Keeping Requirements
D.3	FACILITY OPERATION CONDITIONS - Degreasing (EU6)
	Emission Limitations and Standards [326 IAC 2-7-5(1)] D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]
	Compliance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)] D.3.2 Halogenated Solvent NESHAP[326 IAC 20-6] [40 CFR Part 63, Subpart T] D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]
	Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19] D.3.4 Reporting Requirements
D.4	FACILITY OPERATION CONDITIONS - Door Assembly Line
	Emission Limitations and Standards [326 IAC 2-7-5(1)] D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6] D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-9] D.4.3 Particulate Matter (PM) [326 IAC 6-3-2(c)] D.4.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]
	Compliance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]  D.4.5 Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11]  D.4.6 Volatile Organic Compounds (VOC)  D.4.7 Particulate Matter (PM)
	Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]  D.4.8 Monitoring D.4.9 Visible Emissions Notations D.4.10 Parametric Monitoring D.4.11 Baghouse Inspections D.4.12 Broken or Failed Bag Detection D.4.13 Cyclone Inspections D.4.14 Cyclone Failure Detection
	Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19] D.4.15 Record Keeping Requirements
D.5	FACILITY OPERATION CONDITIONS - Sheet Molding Compound Production Line 39f
	Emission Limitations and Standards [326 IAC 2-7-5(1)]  D.5.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]  D.5.2 HAPs [326 IAC 2-1-3.4]  D.5.3 Volatile Organic Compounds (VOC)  D.5.4 Particulate Matter (PM) [326 IAC 6-3]  D.5.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

First Minor Source Modification 033-14449-00019 Amended by: Allen R. Davidson

Therma Tru Corporation Butler, Indiana Permit Reviewer: J. Patterson

Page of 44 OP No. T033-7927-00019

	D.5.6	ance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)] Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11] Halogenated Solvent Cleaning Machine NESHAP [326 IAC 20-6][40 CFR Part 63, Subpart T]	
	D.5.8	Particulate Matter (PM)	
	Compli	ance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]	
	D.5.9	Visible Emissions Notations	
	D.5.10	Parametric Monitoring	
	D.5.11	Baghouse Inspections	
	D.5.12	Broken or Failed Bag Detection	
	Record	Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]	
	D.5.13	Record Keeping Requirements	
	D.5.14	Reporting Requirements	
Certific	ation .		40
		viation Occurrence Report	
		orts	
		pliance Monitoring Report	
	, , ,		

First Minor Source Modification 033-14449-00019 Amended by: Allen R. Davidson

Page of 44

OP No. T033-7927-00019

SOURCE SUMMARY

**SECTION A** 

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

#### General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] A.1

The Permittee owns and operates a stationary metal doors, sash and trim plastics products manufacturing plant

Responsible Official: Robert Nichols

Source Address: 108 Mutzfeld Road, Butler, IN 46721 Mailing Address: 108 Mutzfeld Road, Butler, IN 46721

SIC Code: 3442 and 3089

County Location: Dekalb

County Status: Attainment for all criteria pollutants

Source Status: Part 70 Permit Program

Minor Source, under PSD Rules;

Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (1) Fiberglass operations, identified as EU1, consisting of one (1) resin mixer, one (1) fiberglass extruder (SMC) and six (6) fiberglass presses, with a maximum capacity of 17,280 pounds of resin per hour, and exhausting to stacks 13.1, 13.2 13.3 and 13.4
- (2) One door skin gluing operation, identified as EU2, with a maximum capacity of 360 doors per hour, and exhausting to stacks 1.1 and 1.2.
- (3)One (1) flowcoating operation, identified as EU3, consisting of one (1) flowcoater, equipped with filters, replaced in 2000, one (1) flash off tunnel and one (1) paint cure oven, with a maximum capacity of 360 doors per hour, and exhausting to stacks 3.1and 3.2, 4.1 and 4.2, and 4.3 and 4.4 respectively.
- (4) One (1) machining station, identified as EU4, with a maximum capacity of 360 doors per hour, using a dust collector for particulate emission control, and exhausting to stack 5.1.
- One (1) calcium carbonate storage silo, identified as EU5, with a maximum throughput (5) of 16,500 pounds per day, and using a baghouse for particulate control.
- (6) Degreasing operations, identified as EU6, consisting of one (1) Safety Kleen cold cleaner and one (1) methylene chloride cold cleaner, exhausting to stacks 13.1, 13.2, 13.3 and 13.4.

## Door Assembly Line, capacity: 20,250 pounds of doors per hour or 450 doors per hour

Page of 44

OP No. T033-7927-00019

- (7) One (1) electric door skin preheat oven, known as D2-OV1, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.1, capacity: 20,250 pounds per hour of fiberglass door skins per hour or 450 doors per hour.
- (8) One (1) adhesive application station, known as D2-APP1, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.2, capacity, 43 pounds of adhesive per hour or 450 doors per hour.
- (9) One (1) electric glue curing oven, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.2, known as D2-OV2, capacity: 450 doors per hour.
- (10) One (1) electric skin reheat oven, known as D2-OV3, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.3, capacity: 450 doors per hour.
- (11) One (1) door foam injection system, known as D2-F1, exhausting through Stack 19.1, capacity: 2,300 pounds of resin and foam insulation per hour or 450 doors per hour.
- One (1) door machining station, known as D2-MS1, equipped with a baghouse and cyclone connected in series, known as D2-DC1, exhausting through Stack 20.1, capacity: 450 doors per hour or 20,250 pounds per hour.

## **New Skins Warehouse**

Molding Plant Sheet Molding Compound Production Line, known as SMC2, capacity: 18,500 pounds of molding compound per hour, consisting of:

- (13) One (1) existing permitted calcium carbonate silo to be relocated, equipped with a baghouse, known as SILO1, exhausting through Stacks 25.1, capacity: 150,000 pounds calcium carbonate.
- (14) Two (2) calcium carbonate silos, known as SILO2 and SILO3, each equipped with a baghouse, exhausting through Stacks 25.2 and 25.3, throughput: 2,960 pounds of calcium carbonate per hour each, capacity: 200,000 pounds calcium carbonate, each.
- (15) Two (2) resin mixers, exhausting through Stack 17.1 and/or Stack 17.2, throughput: 8,880 pounds of calcium carbonate, 4,700 pounds of resin, 648 pounds of pigment mixture, 130 pounds of release agent, and 74 pounds of catalyst per hour.
- (16) One (1) sheet molding compound extruder, exhausting through Stack 17.1 and/or Stack 17.2, throughput 14,432 pounds of materials plus 4,070 pounds of chopped fiberglass strands per hour.
- (17) Four (4) sheet molding compound presses, throughput 18,500 pounds of sheet molding compound per hour.
- (18) One (1) hose cleaning re-circulation station, (cold cleaner tank, known as SMC-CC2), exhausting through Stack 17.1 and/or Stack 17.2, capacity: 0.957 pounds of methylene chloride per hour (based on 20 hours per day at 1.75 gallons per day).

### First Minor Source Modification 033-14449-00019 Amended by: Allen R. Davidson

Page of 44 OP No. T033-7927-00019

## **Door Assembly Line (additional equipment)**

- (19) One (1) two-belt sander, known as EU7, with emissions controlled by D2-DC1, exhausting through Stack 20.1.
- A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(continued on the next page)

#### First Minor Source Modification 033-14449-00019 Amended by: Allen R. Davidson

Page of 44 OP No. T033-7927-00019

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (2) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (3) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (4) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (5) Water based adhesives that are less than or equal to 5% by volume of VOC's excluding HAPs.
- (6) Paved and unpaved roads and parking lots with public access.
- (7) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic feet and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking.
- (8) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).
- (9) A laboratory as defined in 326 IAC 2-7-1(21)(C).
- (10) One foam press with VOC emissions less than 3 lb/hr and 15 lbs/day.
- (11) Two five thousand (5,000) gallon tanks storing urethane system resin component with VOC emissions less than 3 lb/hr and 15 lbs/day.
- (12) Two five thousand (5,000) gallon tanks storing polymethylene polyphenylisocyanate (poly) with VOC emissions less than 3 lb/hr and 15 lbs/day.

### A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) it is a major source, as defined in 326 IAC 2-7-1(22); and
- (b) it is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 Applicability).

**SECTION B** 

Page of 44

OP No. T033-7927-00019

#### **GENERAL CONDITIONS**

## B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

## B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

## B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

## B.4 Enforceability [326 IAC 2-7-7(a)]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

## B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

### B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

## B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

### B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015 Therma Tru Corporation Butler, Indiana

Permit Reviewer: J. Patterson

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

Page of 44

OP No. T033-7927-00019

(c) Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must-furnish such records to IDEM, OAQ, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAQ, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

## B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

### B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

## B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015 Therma Tru Corporation

Butler, Indiana

Permit Reviewer: J. Patterson

First Minor Source Modification 033-144

Amended by: Allen R. Davidso

First Minor Source Modification 033-14449-00019 Page of 44
Amended by: Allen R. Davidson OP No. T033-7927-00019

and

United States Environmental Protection Agency, Region V Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J) 77 West Jackson Boulevard Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was based on continuous or intermittent data:
  - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
  - (5) Any insignificant activity that has been added without a permit revision:
  - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

# B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units and associated emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions:
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Page of 44

OP No. T033-7927-00019

Therma Tru Corporation Butler, Indiana Permit Reviewer: J. Patterson

> Indiana Department of Environmental Management Compliance Branch, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and (c) approval by IDEM, OAQ.

#### Emergency Provisions [326 IAC 2-7-16] B.13

- An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - An emergency occurred and the Permittee can, to the extent possible, identify the (1) causes of the emergency:
  - The permitted facility was at the time being properly operated; (2)
  - (3)During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered:

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,

Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management Compliance Branch, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

#### First Minor Source Modification 033-14449-00019 Amended by: Allen R. Davidson

OP No. T033-7927-00019

Page of 44

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

#### First Minor Source Modification 033-14449-00019 Amended by: Allen R. Davidson

Page of 44 OP No. T033-7927-00019

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

## B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
  - (1) The applicable requirements are included and specifically identified in this permit; or
  - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

Page of 44

OP No. T033-7927-00019

## B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

## B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management Compliance Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
  - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) An emergency as defined in 326 IAC 2-7-1(12); or
  - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
  - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

## B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]

#### First Minor Source Modification 033-14449-00019 Amended by: Allen R. Davidson

- Page of 44 OP No. T033-7927-00019
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

## B.18 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due. [326 IAC 2-5-3]

#### First Minor Source Modification 033-14449-00019 Amended by: Allen R. Davidson

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

Page of 44

OP No. T033-7927-00019

- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3] If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)] If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

## B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

# B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

First Minor Source Modification 033-14449-00019 Amended by: Allen R. Davidson

Therma Tru Corporation Butler, Indiana Permit Reviewer: J. Patterson

## B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

Page of 44

OP No. T033-7927-00019

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

## B.22 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
  - (1) The changes are not modifications under any provision of Title I of the Clean Air Act:
  - (2) Any approval required by 326 IAC 2-1 has been obtained;
  - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions):
  - (4) The Permittee notifies the:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J) 77 West Jackson Boulevard Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

#### First Minor Source Modification 033-14449-00019 Amended by: Allen R. Davidson

Page of 44 OP No. T033-7927-00019

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
  - (1) A brief description of the change within the source;
  - (2) The date on which the change will occur;
  - (3) Any change in emissions; and
  - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
  The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
  The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

#### B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

### B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

#### First Minor Source Modification 033-14449-00019 Amended by: Allen R. Davidson

- Page of 44 OP No. T033-7927-00019
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]
  - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAQ, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAQ, nor an authorized representative, may disclose the information unless and until IDEM, OAQ, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
  - (2) The Permittee, and IDEM, OAQ, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

## B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11] Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAQ, shall reserve the right to issue a new permit.

## B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

#### First Minor Source Modification 033-14449-00019 Amended by: Allen R. Davidson

Page of 44 OP No. T033-7927-00019

## B.27 Enhanced New Source Review [326 IAC 2]

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

## B.28 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]

Not withstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non compliance.

#### First Minor Source Modification 033-14449-00019 Amended by: Allen R. Davidson

Page of 44 OP No. T033-7927-00019

#### **SECTION C**

#### **SOURCE OPERATION CONDITIONS**

#### **Entire Source**

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

## C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

- (a) The total source potential to emit criteria pollutants is less than 250 tons per 365 consecutive day period. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase potential emissions to 250 tons per twelve (12) consecutive month period, from the equipment covered in this permit, shall require a PSD permit pursuant to 326 IAC 2-2, before such change may occur.
- C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

## C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

### C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

## C.5 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

## C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

#### C.7 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

Page of 44 OP No. T033-7927-00019

## C.8 Stack Height [326 IAC 1-7]

(a) The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

## C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management Asbestos Section, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4
and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are
mandatory for any removal or disturbance of RACM greater than three (3) linear feet on
pipes or three (3) square feet on any other facility components or a total of at least 0.75
cubic feet on all facility components.

First Minor Source Modification 033-14449-00019 Amended by: Allen R. Davidson

Therma Tru Corporation Butler, Indiana Permit Reviewer: J. Patterson

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Page of 44

OP No. T033-7927-00019

## Testing Requirements [326 IAC 2-7-6(1)]

## C.10 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis. Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

## C.11 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

Page of 44 OP No. T033-7927-00019

## C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management Compliance Branch, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

in writing, prior to the end of the ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## C.13 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

## C.14 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

#### C.15 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

## Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

## C.16 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

First Minor Source Modification 033-14449-00019 Amended by: Allen R. Davidson

Therma Tru Corporation Butler, Indiana

Permit Reviewer: J. Patterson

These ERPs shall be submitted for approval to: (b)

> Indiana Department of Environmental Management Compliance Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Page of 44

OP No. T033-7927-00019

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

#### Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215] C.17

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- Submit: (a)
  - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
  - (2)As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
  - (3)A verification to IDEM, OAQ, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAQ, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### First Minor Source Modification 033-14449-00019 Amended by: Allen R. Davidson

Page of 44 OP No. T033-7927-00019

## C.18 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
  - (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
    - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
    - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
  - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

#### First Minor Source Modification 033-14449-00019 Amended by: Allen R. Davidson

- Page of 44 OP No. T033-7927-00019
- (3) An automatic measurement was taken when the process was not operating; or
- (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

# C.19 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C Performance Testing, of this permit exceed the level specified in any condition of this
  permit, the Permittee shall take appropriate corrective actions. The Permittee shall
  submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of
  receipt of the test results. The Permittee shall take appropriate action to minimize
  emissions from the affected facility while the corrective actions are being implemented.
  IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions
  taken are deficient. The Permittee shall submit a description of additional corrective
  actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency.
  IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant
  stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

### Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

## C.20 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
  - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

First Minor Source Modification 033-14449-00019 Amended by: Allen R. Davidson Page of 44 OP No. T033-7927-00019

Indiana Department of Environmental Management Technical Support and Modeling Section, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

## C.21 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

## C.22 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative, for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner (or local agency) makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or local agency within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;

#### First Minor Source Modification 033-14449-00019 Amended by: Allen R. Davidson

Page of 44 OP No. T033-7927-00019

- (2) The dates analyses were performed;
- (3) The company or entity performing the analyses;
- (4) The analytic techniques or methods used;
- (5) The results of such analyses; and
- (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C Compliance Monitoring Plan Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

### C.23 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

#### First Minor Source Modification 033-14449-00019 Amended by: Allen R. Davidson

- Page of 44 OP No. T033-7927-00019
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## **Stratospheric Ozone Protection**

## C.24 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

#### First Minor Source Modification 033-14449-00019 Amended by: Allen R. Davidson

Page of 44 OP No. T033-7927-00019

#### **SECTION D.1**

#### **FACILITY OPERATION CONDITIONS**

## Facility Description [326 IAC 2-7-5(15)]

- (1) Fiberglass operations, identified as EU1, consisting of one (1) resin mixer, one (1) fiberglass extruder (SMC) and six (6) fiberglass presses, with a maximum capacity of 17,280 pounds of resin per hour, and exhausting to stacks 13.1, 13.2 13.3 and 13.4
- (2) One door skin gluing operation, identified as EU2, with a maximum capacity of 360 doors per hour, and exhausting to stacks 1.1 and 1.2.
- One (1) flowcoating operation, identified as EU3, consisting of one (1) flowcoater, equipped with filters, replaced in 2000, one (1) flash off tunnel and one (1) paint cure oven, with a maximum capacity of 360 doors per hour, and exhausting to stacks 3.1 and 3.2, 4.1 and 4.2, and 4.3 and 4.4 respectively.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

## Emission Limitations and Standards [326 IAC 2-7-5(1)]

## D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

- (a) The total potential to emit VOCs from the fiberglass operation (EU1) shall be limited to 24 tons per year, based on a monthly rolling average. Therefore, pursuant to 326 IAC 8-1-6 (BACT), this facility will not be subject to this rule.
- (b) Any change or modification which may increase the actual emissions of VOC to 25 tons or more per year from the fiberglass operations (EU1) must be approved by the Office of Air Quality before such change may occur.
- (c) Any change or modification which may increase the potential emissions of VOC to 25 tons or more per year from the door skin gluing operations (EU2) must be approved by the Office of Air Quality before such change may occur.

### D.1.2 Volatile Organic Compounds (VOC) [326 IAC 2-2]

The flowcoater (EU3) shall use less than 74.8 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period. This usage limit is required to limit the potential to emit of VOC to less than 74.8 tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

### D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating), the volatile organic compound (VOC) content of coating delivered to the applicator at the flowcoating operation (EU3) shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.
- (b) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

#### First Minor Source Modification 033-14449-00019 Amended by: Allen R. Davidson

Page of 44 OP No. T033-7927-00019

## D.1.4 PM and PM<sub>10</sub> [326 IAC 2-2]

The PM and PM<sub>10</sub> emissions from the flowcoater (EU3) shall not exceed 1.19 pounds per hour. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

## D.1.5 Particulate Matter (PM) [326 IAC 6-3-2(c)]

(a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the fiberglass operation shall not exceed 17.38 pounds per hour when operating at a process weight rate of 17280 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

 $E = 4.10 P^{0.67}$  where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

(b) Pursuant to 326 IAC 6-3-2(c)(Particulate Emission Limitations), the particulate matter (PM) overspray from the door skin gluing operation (EU2) shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

 $E = 4.10 P^{0.67}$  where E = rate of emission in pounds per hour and P = process weight rate in tons per hour

### D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the flowcoating operation and any control devices.

## **Compliance Determination Requirements**

## D.1.7 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

### D.1.8 VOC Emissions

Compliance with Conditions D.1.1(a) and D.1.2 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent 12 month period.

## Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

## D.1.9 Particulate Matter (PM)

The filters for PM control shall be in operation at all times when the flowcoater (EU3) is in operation.

#### D.1.10 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (3.1 and 3.2) while the flowcoater is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered

rce Modification 033-14449-00019 Page of 44 ded by: Allen R. Davidson OP No. T033-7927-00019

a violation of this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C Compliance Monitoring Plan Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

# D.1.11 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
  - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The volume weighted VOC content of the coatings used for each day that any coating with VOC content greater than 3.5 pounds per gallon, less water, is used, by:

$$\frac{\text{lb VOC}}{\text{gallon less water}} = \frac{\text{E coatings } [\text{Dc * O * Q / [1-W * Dc / Dw]}]}{\text{E C}}$$

Dc = density of coating, lb/gal
O = weight percent organics, %
W = percent volume water, %

Dw = density of water, lb/gal
Q = quantity of coating, gal/unit
C = total of coatings used, gal/unit

- (4) The cleanup solvent usage for each month;
- (5) The total VOC usage for each month; and
- (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

#### First Minor Source Modification 033-14449-00019 Amended by: Allen R. Davidson

Page of 44 OP No. T033-7927-00019

- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (2) A log of the dates of use;
- (3) The cleanup solvent usage for each month;
- (4) The total VOC usage for each month; and
- (5) The weight of VOCs emitted for each compliance period.
- (c) To document compliance with Conditions D.1.8 and D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

# D.1.12 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1(a) and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

Page of 44 OP No. T033-7927-00019

#### **SECTION D.2**

#### **FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)]

- (4) One (1) machining station, identified as EU4, with a maximum capacity of 360 doors per hour, using a dust collector for particulate emission control, and exhausting to stack 5.1.
- One (1) calcium carbonate storage silo, identified as EU5, with a maximum throughput of 16,500 pounds per day, and using a baghouse for particulate control.

# Emission Limitations and Standards [326 IAC 2-7-5(1)]

# D.2.1 Particulate Matter (PM) [326 IAC 6-3]

(a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the machining operation (EU4) shall not exceed 18.58 pounds per hour when operating at a process weight rate of 19080 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

 $E = 4.10 P^{0.67}$  where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

(b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the calcium carbonate silo operation (EU5) shall not exceed 2.0 pounds per hour when operating at a process weight rate of 688 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

 $E = 4.10 P^{0.67}$  where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

# D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the machining operation (EU4) and its control device.

# **Compliance Determination Requirements**

# D.2.3 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Page of 44 OP No. T033-7927-00019

# D.2.4 Particulate Matter (PM)

The baghouse for PM control shall be in operation at all times when the machining operation (EU4) and calcium carbonate silo (EU5) are in operation and exhausting to the outside atmosphere.

# Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

# D.2.5 Visible Emissions Notations

- (a) Daily visible emission notations of the machining operation (EU4) stack exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

#### D.2.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the machining operation, at least once weekly when the machining process is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 4.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

# D.2.7 Broken Bag or Failure Detection

In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.

#### First Minor Source Modification 033-14449-00019 Amended by: Allen R. Davidson

Page of 44 OP No. T033-7927-00019

(b) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.

# Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

# D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the machining operation stack exhaust.
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain the following:
  - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
    - (A) Inlet and outlet differential static pressure; and
    - (B) Cleaning cycle: frequency and differential pressure
  - (2) Documentation of all response steps implemented, per event .
  - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
  - (4) Quality Assurance/Quality Control (QA/QC) procedures.
  - (5) Operator standard operating procedures (SOP).
  - (6) Manufacturer's specifications or its equivalent.
  - (7) Equipment "troubleshooting" contingency plan.
  - (8) Documentation of the dates vents are redirected.
- (c) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

Page of 44 OP No. T033-7927-00019

#### **SECTION D.3**

#### **FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)]

(6) Degreasing operations, identified as EU6, consisting of one (1) Safety Kleen cold cleaner and one (1) methylene chloride cold cleaner, exhausting to stacks 13.1, 13.2, 13.3 and 13.4.

# Emission Limitations and Standards [326 IAC 2-7-5(1)]

# D.3.1 Volatile Organic Compounds (VOC)

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
  - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
    - (B) The solvent is agitated; or
    - (C) The solvent is heated.
  - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
  - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
  - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

#### First Minor Source Modification 033-14449-00019 Amended by: Allen R. Davidson

OP No. T033-7927-00019

Page of 44

- (B) A water cover when solvent is used is insoluble in, and heavier than, water.
- (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
  - (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

# **Compliance Determination Requirements**

D.3.2 Halogenated Solvent Cleaning Machine NESHAP [326 IAC 20-6][40 CFR Part 63, Subpart T]

This facility is subject to 40 CFR Part 63, Subpart T, (Halogenated Solvent Cleaning Machine NESHAP) that was promulgated on December 2, 1994. The source shall come into compliance with this rule no later than December 2, 1997.

The following design requirements for the degreasing operation are applicable:

- (a) Each owner or operator of an immersion batch cold solvent cleaning machine shall comply with the requirement of one of the following:
  - (1) Employ a tightly fitting cover that shall be closed at all times except during parts entry and removal, and a water layer at a minimum thickness of 2.5 centimeters (1.0 inch) on the surface of the solvent within the cleaning machine, or
  - (2) Employ a tightly fitting cover that shall be closed at all times except during parts entry and removal and a freeboard ration of 0.75 or greater.
- (b) Each owner or operator of a remote -reservoir batch cold solvent cleaning machine shall employ a tightly fitting cover over the solvent pump that shall be closed at all times except during the cleaning of parts.
- (c) Each owner or operator of a batch cold solvent cleaning machine shall comply with the following work and operational practice requirements:
  - (1) All waste solvent shall be collected and stored in closed containers. The closed container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container.
  - (2) If a flexible hose or flushing device is used, flushing shall be performed only within the freeboard area of the solvent cleaning machine.

First Minor Source Modification 033-14449-00019 Amended by: Allen R. Davidson

- Page of 44 OP No. T033-7927-00019
- (3) The owner or operator shall drain solvent cleaned parts for 15 seconds or until dripping has stopped, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while draining.
- (4) The owner or operator shall ensure that the solvent level does not exceed the fill line.
- (5) Spills during solvent transfer shall be wiped up immediately. The wipe rags shall be stored in covered containers meeting the requirements of (1) of this section.
- (6) When an air- or pump-agitated solvent bath is used, the owner or operator shall ensure the agitator is operated to produce a rolling motion of the solvent but not observable splashing against tank walls or parts being cleaned.
- (7) The owner or operator shall ensure that, when the cover is open, the cold cleaning machine is not exposed to drafts greater than 40 meters per minute (132 feet per minute), as measured between 1 and 2 meters (3.3 and 6.6 feet) upwind and at the same elevation as the tank lip.
- (8) Sponges, fabric, wood and paper products shall not be cleaned.

# D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for methylene chloride degreaser.

# Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

# D.3.4 Reporting Requirements

Submit an initial notification report immediately to the address listed in Section C - General Reporting Requirements, of this permit, and to the following address:

United States Environmental Protection Agency, Region V Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J) 77 West Jackson Boulevard Chicago, Illinois 60604-3590

- (a) The report shall include the following information:
  - (i) The name and address of the owner or operator;
  - (ii) The address of the solvent cleaning machine;
  - (iii) A brief description of each solvent cleaning machine including machine type, solvent/air interface area and existing controls;

# First Minor Source Modification 033-14449-00019 Amended by: Allen R. Davidson

- Page of 44 OP No. T033-7927-00019
- (iv) The date of installation for the solvent cleaning machine;
- (v) The anticipated compliance approach for the solvent cleaning machine;
- (vi) An estimated annual halogenated HAP solvent consumption for the solvent cleaning machine.
- (b) Submit an initial statement of compliance for the solvent cleaning machine no later than 150 days after December 2, 1997. This statement shall include:
  - (i) The name and address of the owner or operator;
  - (ii) The address of the solvent cleaning machine;
  - (iii) A statement, signed by the owner or operator of the solvent cleaning machine, stating that the solvent cleaning machine for which the report is being submitted is in compliance with Condition D.2.2.
  - (iv) The compliance approach for each solvent cleaning machine.

Page of 44 OP No. T033-7927-00019

#### **SECTION D.4**

#### **FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)]

# Door Assembly Line, capacity: 20,250 pounds of doors per hour or 450 doors per hour, consisting of:

- (7) One (1) electric door skin preheat oven, known as D2-OV1, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.1, capacity: 20,250 pounds per hour of fiberglass door skins per hour or 450 doors per hour.
- (8) One (1) adhesive application station, known as D2-APP1, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.2, capacity, 43 pounds of adhesive per hour or 450 doors per hour.
- (9) One (1) electric glue curing oven, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.2, known as D2-OV2, capacity: 450 doors per hour.
- (10) One (1) electric skin reheat oven, known as D2-OV3, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.3, capacity: 450 doors per hour.
- (11) One (1) door foam injection system, known as D2-F1, exhausting through Stack 19.1, capacity: 2,300 pounds of resin and foam insulation per hour or 450 doors per hour.
- (12) One (1) door machining station, known as D2-MS1, equipped with a baghouse and cyclone connected in series, known as D2-DC1, exhausting through Stack 20.1, capacity: 450 doors per hour or 20,250 pounds per hour.
- (19) One (1) two-belt sander, known as EU7, with emissions controlled by D2-DC1, exhausting through Stack 20.1.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

# Emission Limitations and Standards [326 IAC 2-7-5(1)]

# D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Any change or modification which may increase the potential emissions of VOC to twenty-five (25) tons per year from the door assembly line adhesive application station must be approved by the Office of Air Quality before such change may occur.

# D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating), the volatile organic compound (VOC) content of coating delivered to the applicator at the door assembly line adhesive application station shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.
- (b) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

### First Minor Source Modification 033-14449-00019 Amended by: Allen R. Davidson

Page of 44 OP No. T033-7927-00019

# D.4.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

- (a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the door assembly line adhesive application station shall not exceed 19.3 pounds per hour when operating at a process weight rate of 10.1 tons per hour.
- (b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the door machining station, known as D2-MS1, equipped with a baghouse and cyclone connected in series, known as D2-DC1, shall not exceed 19.3 pounds per hour when operating at a process weight rate of 10.1 tons per hour.
- (c) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the belt sander known as EU-7 shall not exceed 1.37 pounds per hour when operating at a process weight rate of 0.2 tons per hour.
- (d) The pounds per hour limitations were calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

 $E = 4.10 P^{0.67}$  where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

# D.4.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the door assembly line adhesive application station and the door machining station and any control devices.

# Compliance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]

# D.4.5 Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11]

- (a) Within 180 days after start-up of the door machining station, known as D2-MS1, the Permittee shall perform PM testing utilizing Methods 5 or 17 (40 CFR 60, Appendix A) or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.
- (b) The Permittee is not required to test the adhesive application station by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the adhesive application station is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.4.3(a) shall be determined by a performance test conducted in accordance with Section C Performance Testing.

# D.4.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content contained in Conditions D.4.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

# D.4.7 Particulate Matter (PM)

The baghouse and cyclone in series for PM control shall be in operation and control emissions at all times that any process it controls is in operation.

# Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

# D.4.8 Monitoring

(a) Monthly inspections shall be performed of the adhesive application station coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Page of 44

OP No. T033-7927-00019

(b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

# D.4.9 Visible Emissions Notations

- (a) Visible emission notations of the stack 20.1 exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

# D.4.10 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the door machining station, at least once daily when the machining station is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 4.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

#### First Minor Source Modification 033-14449-00019 Amended by: Allen R. Davidson

Page of 44 OP No. T033-7927-00019

# D.4.11 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the door machining station operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

# D.4.12 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B Emergency Provisions).

#### D.4.13 Cyclone Inspections

An inspection shall be performed each calender quarter of all cyclones controlling the door machining operation when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

# D.4.14 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

# Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

# D.4.15 Record Keeping Requirements

- (a) To document compliance with Condition D.4.8, the Permittee shall maintain a log of monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (b) To document compliance with Condition D.4.9, the Permittee shall maintain records of daily visible emission notations of the door machining station stack exhaust.
- (c) To document compliance with Condition D.4.10, the Permittee shall maintain the following:

#### First Minor Source Modification 033-14449-00019 Amended by: Allen R. Davidson

Page of 44 OP No. T033-7927-00019

- (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
  - (A) Inlet and outlet differential static pressure; and
  - (B) Cleaning cycle: frequency and differential pressure.
- (2) Documentation of all response steps implemented, per event .
- (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
- (4) Quality Assurance/Quality Control (QA/QC) procedures.
- (5) Operator standard operating procedures (SOP).
- (6) Manufacturer's specifications or its equivalent.
- (7) Equipment "troubleshooting" contingency plan.
- (8) Documentation of the dates vents are redirected.
- (d) To document compliance with Conditions D.4.11 and D.4.13, the Permittee shall maintain records of the results of the inspections required under Conditions D.4.11 and D.4.13 and the dates the vents are redirected.
- (e) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

Page of 44 OP No. T033-7927-00019

#### **SECTION D.5**

#### **FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)]

Molding Plant Sheet Molding Compound Production Line, known as SMC2, capacity: 18,500 pounds of molding compound per hour, consisting of:

- (13) One (1) existing permitted calcium carbonate silo to be relocated, equipped with a baghouse, known as SILO1, exhausting through Stacks 25.1, capacity: 150,000 pounds calcium carbonate.
- (14) Two (2) calcium carbonate silos, known as SILO2 and SILO3, each equipped with a baghouse, exhausting through Stacks 25.2 and 25.3, throughput: 2,960 pounds of calcium carbonate per hour each, capacity: 150,000 pounds calcium carbonate, each.
- (15) One (1) resin mixer, exhausting through Stack 17.1 and/or Stack 17.2, throughput: 8,880 pounds of calcium carbonate, 4,700 pounds of resin, 648 pounds of pigment mixture, 130 pounds of release agent, and 74 pounds of catalyst per hour.
- (16) One (1) sheet molding compound extruder, exhausting through Stack 17.1 and/or Stack 17.2, throughput 14,432 pounds of materials plus 4,070 pounds of chopped fiberglass strands per hour.
- (17) One (1) sheet molding compound press, throughput 18,500 pounds of sheet molding compound per hour.
- (18) One (1) hose cleaning re-circulation station, (cold cleaner tank, known as SMC-CC2), exhausting through Stack 17.1 and/or Stack 17.2, capacity: 0.957 pounds of methylene chloride per hour (based on 20 hours per day at 1.75 gallons per day).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

# Emission Limitations and Standards [326 IAC 2-7-5(1)]

# D.5.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

The total potential to emit VOCs from the sheet molding compound production line shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period. The total potential to emit VOCs shall be calculated by multiplying the total mass of volatile organic compounds (VOC) in resins applied to the applicators times a flashoff factor of three percent (3%) from AP-42 or a lower emission factor substantiated by a performance test. In addition, any VOCs delivered to the applicators from the use of clean-up solvents and other materials shall be included in the total potential to emit VOCs from the sheet molding compound production line. Therefore, this VOC emission limit will render 326 IAC 8-1-6 not applicable to the sheet molding compound production line.

#### D.5.2 HAPs [326 IAC 2-1-3.4]

The total potential to emit a single and combination of HAPs from the sheet molding compound production line shall be limited to less than ten (10) and twenty-five (25) tons per twelve (12) consecutive month period, respectively. The total potential to emit HAPs shall be calculated by multiplying the total mass of HAPs in resins applied to the applicators times a flashoff factor of three percent (3%) from AP-42 or a lower emission factor substantiated by a performance test. In addition,

Page of 44 OP No. T033-7927-00019

any HAPs delivered to the applicators from the use of clean-up solvents and other materials shall be included in the total potential to emit HAPs from the sheet molding compound production line. Therefore, these HAPs limits will render 326 IAC 2-1-3.4 not applicable to the sheet molding compound production line.

# D.5.3 Volatile Organic Compounds (VOC)

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
  - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
    - (B) The solvent is agitated; or
    - (C) The solvent is heated.
  - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
  - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
  - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
    - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

Therma Tru Corporation Butler, Indiana Permit Reviewer: J. Patterson

- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
  - (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

Page of 44

OP No. T033-7927-00019

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

# D.5.4 Particulate Matter (PM) [326 IAC 6-3]

(a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the sheet molding compound production line shall not exceed 18.2 pounds per hour when operating at a process weight rate of 9.25 tons per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

 $E = 4.10 P^{0.67}$  where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

(b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the calcium carbonate silos, known as SILO2 and SILO3, shall not exceed 5.33 pounds per hour each when operating at a process weight rate of 1.48 tons per hour each.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

 $E = 4.10 P^{0.67}$  where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

# D.5.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the sheet molding compound production line, including the hose cleaning re-circulation station, (cold cleaner tank, known as SMC-CC2).

# Compliance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]

# D.5.6 Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facilities are in compliance. If testing is required by IDEM, compliance with the PM limits specified in Condition D.5.4 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Therma Tru Corporation Butler, Indiana Permit Reviewer: J. Patterson

D.5.7 Halogenated Solvent Cleaning Machine NESHAP [326 IAC 20-6][40 CFR Part 63, Subpart T]

The hose cleaning re-circulation station, (cold cleaner tank, known as SMC-CC2) is subject to 40 CFR Part 63, Subpart T, (Halogenated Solvent Cleaning Machine NESHAP) that was promulgated on December 2, 1994.

The following design requirements for the degreasing operation are applicable:

- (a) Each owner or operator of an immersion batch cold solvent cleaning machine shall comply with the requirement of one of the following:
  - (1) Employ a tightly fitting cover that shall be closed at all times except during parts entry and removal, and a water layer at a minimum thickness of 2.5 centimeters (1.0 inch) on the surface of the solvent within the cleaning machine, or

Page of 44

OP No. T033-7927-00019

- (2) Employ a tightly fitting cover that shall be closed at all times except during parts entry and removal and a freeboard ration of 0.75 or greater.
- (b) Each owner or operator of a remote -reservoir batch cold solvent cleaning machine shall employ a tightly fitting cover over the solvent pump that shall be closed at all times except during the cleaning of parts.
- (c) Each owner or operator of a batch cold solvent cleaning machine shall comply with the following work and operational practice requirements:
  - (1) All waste solvent shall be collected and stored in closed containers. The closed container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container.
  - (2) If a flexible hose or flushing device is used, flushing shall be performed only within the freeboard area of the solvent cleaning machine.
  - (3) The owner or operator shall drain solvent cleaned parts for 15 seconds or until dripping has stopped, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while draining.
  - (4) The owner or operator shall ensure that the solvent level does not exceed the fill line.
  - (5) Spills during solvent transfer shall be wiped up immediately. The wipe rags shall be stored in covered containers meeting the requirements of (1) of this section.
  - (6) When an air- or pump-agitated solvent bath is used, the owner or operator shall ensure the agitator is operated to produce a rolling motion of the solvent but not observable splashing against tank walls or parts being cleaned.
  - (7) The owner or operator shall ensure that, when the cover is open, the cold cleaning machine is not exposed to drafts greater than 40 meters per minute (132 feet per minute), as measured between 1 and 2 meters (3.3 and 6.6 feet) upwind and at the same elevation as the tank lip.

Page of 44 OP No. T033-7927-00019

(8) Sponges, fabric, wood and paper products shall not be cleaned.

# D.5.8 Particulate Matter (PM)

The baghouses for PM control shall be in operation at all times when the two (2) calcium carbonate silos, known as SILO2 and SILO3, are in operation and exhausting to the outside atmosphere.

# Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

# D.5.9 Visible Emissions Notations

- (a) Visible emission notations of the SILO2 and SILO3 stack 25.2 and 25.3 exhausts shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

# D.5.10 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with SILO2 and SILO3, at least once daily when SILO2 and/or SILO3 are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 4.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

# D.5.11 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the SILO2 and SILO3 operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

Therma Tru Corporation First Minor Source Modification 033-14449-00019 Amended by: Allen R. Davidson

Butler, Indiana Permit Reviewer: J. Patterson

# D.5.12 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Page of 44

OP No. T033-7927-00019

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

# Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

# D.5.13 Record Keeping Requirements

- To document compliance with Conditions D.5.1 and D.5.2, the Permittee shall maintain (a) records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits and the VOC and HAPs emission limits established in Conditions D.5.1 and D.5.2.
  - (1) The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3)The cleanup solvent usage for each month;
  - (4) The total VOC and HAPs usage for each month; and
  - The weight of VOCs and HAPs emitted for each compliance period. (5)
- (b) To document compliance with Condition D.5.9, the Permittee shall maintain records of daily visible emission notations of the SILO2 and SILO3 stack exhausts.
- (c) To document compliance with Condition D.5.10, the Permittee shall maintain the following:
  - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
    - (A) Inlet and outlet differential static pressure; and

#### First Minor Source Modification 033-14449-00019 Amended by: Allen R. Davidson

- Page of 44 OP No. T033-7927-00019
- (B) Cleaning cycle: frequency and differential pressure
- (2) Documentation of all response steps implemented, per event.
- (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
- (4) Quality Assurance/Quality Control (QA/QC) procedures.
- (5) Operator standard operating procedures (SOP).
- (6) Manufacturer's specifications or its equivalent.
- (7) Equipment "troubleshooting" contingency plan.
- (8) Documentation of the dates vents are redirected.
- (d) To document compliance with Condition D.5.11, the Permittee shall maintain records of the results of the inspections required under Condition D.5.11 and the dates the vents are redirected.
- (e) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

# D.5.14 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.5.1 and D.5.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.
- (b) Submit an initial notification report immediately to the address listed in Section C General Reporting Requirements, of this permit, and to the following address:

United States Environmental Protection Agency, Region V Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J) 77 West Jackson Boulevard Chicago, Illinois 60604-3590

The report shall include the following information:

- (1) The name and address of the owner or operator;
- (2) The address of the solvent cleaning machine:
- (3) A brief description of each solvent cleaning machine including machine type, solvent/air interface area and existing controls;
- (4) The date of installation for the solvent cleaning machine;
- (5) The anticipated compliance approach for the solvent cleaning machine;
- (6) An estimated annual halogenated HAP solvent consumption for the solvent cleaning machine.

# First Minor Source Modification 033-14449-00019 Amended by: Allen R. Davidson

- Page of 44 OP No. T033-7927-00019
- (c) Submit an initial statement of compliance for the solvent cleaning machine. This statement shall include:
  - (1) The name and address of the owner or operator;
  - (2) The address of the solvent cleaning machine;
  - (3) A statement, signed by the owner or operator of the solvent cleaning machine, stating that the solvent cleaning machine for which the report is being submitted is in compliance with Condition D.5.7.
  - (4) The compliance approach for each solvent cleaning machine.

First Minor Source Modification 033-14449-00019 Therma Tru Corporation Butler, Indiana Amended by: Allen R. Davidson

Permit Reviewer: J. Patterson

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT **OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION**

Page of 44

OP No. T033-7927-00019

# **PART 70 OPERATING PERMIT CERTIFICATION**

Source Name: Therma Tru Corporation

108 Mutzfeld Road, Butler, Indiana 46721 108 Mutzfeld Road, Butler, Indiana 46721 Source Address: Mailing Address:

Part 70 Permit No.: T033-7927-00019
This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.
Please check what document is being certified:
9 Annual Compliance Certification Letter
9 Test Result (specify)
9 Report (specify)
9 Notification (specify)
9 Other (specify)
I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Signature:
Printed Name:
Title/Position:
Date:

Therma Tru Corporation Butler, Indiana Permit Reviewer: J. Patterson

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

COMPLIANCE DATA SECTION P.O. Box 6015

100 North Senate Avenue Indianapolis, Indiana 46206-6015 Phone: 317-233-5674 Fax: 317-233-5967

# PART 70 OPERATING PERMIT EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Therma Tru Corporation

Source Address: 108 Mutzfeld Road, Butler, Indiana 46721 Mailing Address: 108 Mutzfeld Road, Butler, Indiana 46721

Part 70 Permit No.: T033-7927-00019

# This form consists of 2 pages

C

Page 1 of 2

Page of 44

OP No. T033-7927-00019

Che	ck (	either N	o. 1 or No.2
9 -	1.	This is	s an emergency as defined in 326 IAC 2-7-1(12)
		С	The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
		C	The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9	2.	This is	s a deviation, reportable per 326 IAC 2-7-5(3)(c)

The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

# First Minor Source Modification 033-14449-00019 Amended by: Allen R. Davidson

Page of 44 OP No. T033-7927-00019

f any of the following are not applicable, mark N/A	Page 2 of 2
Date/Time Emergency/Deviation started:	
Date/Time Emergency/Deviation was corrected:	
Was the facility being properly operated at the time of the emergency/deviation? Describe:	Y N
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:	
Estimated amount of pollutant(s) emitted during emergency/deviation:	
Describe the steps taken to mitigate the problem:	
Describe the corrective actions/response steps taken:	
Describe the measures taken to minimize emissions:	
If applicable, describe the reasons why continued operation of the facilities are necimminent injury to persons, severe damage to equipment, substantial loss of capital loss of product or raw materials of substantial economic value:	
Form Completed by: Title / Position: Date: Phone:	

Page of 44

OP No. T033-7927-00019

Therma Tru Corporation Butler, Indiana Permit Reviewer: J. Patterson

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

	Part 70	Quarterly Report	
Source Name: Source Address: Mailing Address: Part 70 Permit No.: Facility: Parameter: Limit:	108 Mutzfeld Road, T033-7927-00019 Fiberglass Operatio VOC 24 tons per year	Butler, Indiana 46721 Butler, Indiana 46721	
	Column 1	Column 2	Column 1 + Column 2
Month	VOC Emissions this Month	VOC Emission previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			
9	No deviation occurred Deviation has been	d in this quarter.	
Title .	/ Position: ature:		

Therma Tru Corporation First Minor Source Modification 033-14449-00019
Butler, Indiana Amended by: Allen R. Davidson
Permit Reviewer: J. Patterson

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY AIR COMPLIANCE BRANCH

Page of 44

OP No. T033-7927-00019

# Part 70 Quarterly Report

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Source Name:	Therma Tru Corporation

Source Address: 108 Mutzfeld Road, Butler, Indiana 46721 Mailing Address: 108 Mutzfeld Road, Butler, Indiana 46721

Part 70 Permit No.: T033-7927-00019 Facility: Flowcoater (EU3)

Parameter: VOC delivered to the flowcoater

Limit: Less than 74.8 tons per twelve (12) consecutive month period

YEAR:	
-------	--

Month	VOC (tons)	VOC (tons)	VOC (tons)
Month	This Month	Previous 11 Months	12 Month Total

9	No deviation occurred in this quarter.		
9	Deviation/s occurred in this quarter.  Deviation has been reported on:		
Submit	ted by:		
Title / F	Position:		
Signatu	ıre:		
Date:			
Phone:			

A certification is not required for this report

### First Minor Source Modification 033-14449-00019 Amended by: Allen R. Davidson

Page of 44

OP No. T033-7927-00019

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

# Part 70 Quarterly Report

Source Name:	Therma Tru Corporation
Course Harrie.	Therma Tra Corporation

Source Address: 108 Mutzfeld Road, Butler, Indiana 46721 Mailing Address: 108 Mutzfeld Road, Butler, Indiana 46721

Source Mod. No.: SSM 033-10998-00019

Facility: Sheet Molding Compound Line

Parameter: VOC

Phone:

Limit: Single HAP and Combination of HAPs Less than ten (10) and twenty five tons

per twelve (12) consecutive month period, respectively

YEAR: \_\_\_\_\_

Month	This Month (tons)				12 Month Total (tons)	
	Single HAP	Combination of HAPs	Single HAP	Combination of HAPs	Single HAP	Combination of HAPs

9	No deviation occurred in this quarter.		
9	Deviation/s occurred in this quarter.		
	Deviation has been reported on:		
Submit	ted by:		
Title / F	Position:		
Signatu	ıre:		
Date:			

Page of 44

OP No. T033-7927-00019

Therma Tru Corporation Butler, Indiana Permit Reviewer: J. Patterson

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

# PART 70 OPERATING PERMIT QUARTERLY COMPLIANCE MONITORING REPORT

ource Name: Therma Tru Corporation ource Address: 108 Mutzfeld Road, Butler, Indiana 46721 ailing Address: 108 Mutzfeld Road, Butler, Indiana 46721 art 70 Permit No.: T033-7927-00019					
Mo	nths:to	Year:			
This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".					
9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD					
9 THE FOLLOWING	DEVIATIONS OCCURR	ED THIS REPORTING PERI	OD.		
Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)  Number of Deviations  Date of each Deviation			Date of each Deviation		
Form Completed By: Title/Position: Date: Phone:					

Attach a signed certification to complete this report.

# Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Minor Source Modification to a Part 70 Operating Permit

# **Source Background and Description**

Source Name: Therma Tru Corporation

Source Location: 108 Mutzfeld Road, Butler, IN 46721-9515

County: DeKalb
SIC Code: 3442, 3089
Operation Permit No.: 033-7927-00019
Operation Permit Issuance Date: November 12, 2001
Revision No.: 033-14449-00019
Permit Reviewer: Allen R. Davidson

On June 1, 2001, the Office of Air Quality (OAQ) received an application from Therma Tru Corporation relating to the construction and operation of one (1) two-belt sander, known as EU7, with emissions controlled by D2-DC1, exhausting through Stack 20.1.

# **History**

Therma Tru Corporation was issued a Part 70 permit for a door manufacturing plant on November 12, 2001.

The emission source has since received the following modifications:

- (a) Significant Source Modification 033-10998-00019, which approved construction of the Door Assembly Line and New Skins Warehouse, issued on January 21, 2000.
- (b) Significant Permit Modification 033-11605-00019, which incorporated 033-10998-00019 into the Part 70 permit, issued on January 28, 2000.
- (c) Significant Permit Modification 033-11940-00019, which changed various descriptive information and added insignificant activities, issued on June 2, 2000.
- (d) Significant Source Modification 033-12630-00019, which approved construction of flow coater EU3, issued on December 5, 2000
- (e) Administrative Amendment 033-12746-00019, which incorporated 033-12630-00019 into the Part 70 permit, issued on December 8, 2000

This application is the sixth modification to the Part 70 permit.

# **Enforcement Issues**

There are no enforcement actions pending against this emission source.

# **Stack Summary**

This modification utilizes an existing stack. Stack information will not be changed as a result of this modification.

# Recommendation

The staff recommends to the Commissioner that the revision be approved as a minor source modification. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on June 1, 2001.

#### **Emission Calculations**

See Appendix A of this document for detailed emissions calculations. (1 page)

#### **Potential To Emit**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

The following table reflects the existing source potential to emit. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit:

Pollutant	Potential To Emit (tons/year)
PM	Greater than 250
PM-10	Greater than 250
SO <sub>2</sub>	Less than 100
VOC	Greater than 100, less than 250
CO	Less than 100
NO <sub>x</sub>	Less than 100

HAP's	Potential To Emit (tons/year)	
Any single HAP	Less than 10	
Total HAP	Less than 25	

The potential to emit (as defined in 326 IAC 2-1.1-1(16)) particulate matter (PM) and volatile organic compounds (VOC) are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

This existing source is a major source for Prevention of Significant Deterioration, 326 IAC 2-2. Attainment regulated pollutants have the potential to emit at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

The revision's potential to emit is follows:

Pollutant	Potential To Emit (tons/year)	PSD Significant Level (tons/yr)
PM	6.0	25
PM-10	6.0	15
SO <sub>2</sub>	0	40
VOC	0	40
CO	0	100
NO <sub>x</sub>	0	40

НАР	Potential To Emit (tons/year)	PSD Significant Level (tons/yr)
TOTAL	0	n/a

Therma Tru Corporation Page 3 of 6
Butler, IN 46721-9515 033-14449-00019

Reviewer: Allen R. Davidson

The potential to emit (as defined in 326 IAC 2-7-1(29)) particulate matter (PM) is less than 25 tons per year, but greater than five tons per year. Therefore, the revision is classifiable as a minor source modification under 326 IAC 2-7-10.5.

This modification is not a major modification for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 because the increase in potential to emit every attainment pollutant is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

# **County Attainment Status**

The source is located in DeKalb County.

Pollutant	Status	
PM-10	attainment	
SO <sub>2</sub>	attainment	
NO <sub>2</sub>	attainment	
Ozone	attainment	
СО	attainment	
Lead	attainment	

DeKalb County has been classified as attainment or unclassifiable for other pollutants. Therefore, emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

# **Federal Rule Applicability**

There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

# State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of. Pursuant to this rule, the source must annually submit an emission statement for the source. The annual statement must contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

Page 4 of 6 033-14449-00019

Therma Tru Corporation Butler, IN 46721-9515 Reviewer: Allen R. Davidson

# State Rule Applicability - Belt Sander

326 IAC 6-3-2 (Particulate Emissions Limitations)

This emission unit is subject to 326 IAC 6-3-2. Pursuant to 326 IAC 6-3-2 (Particulate Emissions Limitations), particulate matter (PM) emissions shall be limited by the following equation for process weight rates up to sixty thousand (60,000) pounds per hour:

$$E = 4.10 P^{0.67}$$
 where  $E =$  rate of emission in pounds per hour and  $P =$  process weight rate in tons per hour

For a process weight rate of 0.2 tons per hour, this equation provides an emission limit of 1.37 pounds per hour. The control equipment shall be in operation at all times this emission unit is in operation, in order to comply with this limit.

# Revisions

The following changes are being proposed for the Part 70 permit:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (1) Fiberglass operations, identified as EU1, consisting of one (1) resin mixer, one (1) fiberglass extruder (SMC) and six (6) fiberglass presses, with a maximum capacity of 17,280 pounds of resin per hour, and exhausting to stacks 13.1, 13.2 13.3 and 13.4
- (2) One door skin gluing operation, identified as EU2, with a maximum capacity of 360 doors per hour, and exhausting to stacks 1.1 and 1.2.
- (3) One (1) flowcoating operation, identified as EU3, consisting of one (1) flowcoater, equipped with filters, replaced in 2000, one (1) flash off tunnel and one (1) paint cure oven, with a maximum capacity of 360 doors per hour, and exhausting to stacks 3.1 and 3.2, 4.1 and 4.2, and 4.3 and 4.4 respectively.
- (4) One (1) machining station, identified as EU4, with a maximum capacity of 360 doors per hour, using a dust collector for particulate emission control, and exhausting to stack 5.1.
- One (1) calcium carbonate storage silo, identified as EU5, with a maximum throughput of 16,500 pounds per day, and using a baghouse for particulate control.
- (6) Degreasing operations, identified as EU6, consisting of one (1) Safety Kleen cold cleaner and one (1) methylene chloride cold cleaner, exhausting to stacks 13.1, 13.2, 13.3 and 13.4.

Therma Tru Corporation Page 5 of 6
Butler, IN 46721-9515 033-14449-00019

Butler, IN 46721-9515 Reviewer: Allen R. Davidson

# Door Assembly Line, capacity: 20,250 pounds of doors per hour or 450 doors per hour

(7) One (1) electric door skin preheat oven, known as D2-OV1, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.1, capacity: 20,250 pounds per hour of fiberglass door skins per hour or 450 doors per hour.

- (8) One (1) adhesive application station, known as D2-APP1, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.2, capacity, 43 pounds of adhesive per hour or 450 doors per hour.
- (9) One (1) electric glue curing oven, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.2, known as D2-OV2, capacity: 450 doors per hour.
- (10) One (1) electric skin reheat oven, known as D2-OV3, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.3, capacity: 450 doors per hour.
- (11) One (1) door foam injection system, known as D2-F1, exhausting through Stack 19.1, capacity: 2,300 pounds of resin and foam insulation per hour or 450 doors per hour.
- (12) One (1) door machining station, known as D2-MS1, equipped with a baghouse and cyclone connected in series, known as D2-DC1, exhausting through Stack 20.1, capacity: 450 doors per hour or 20,250 pounds per hour.

### **New Skins Warehouse**

Molding Plant Sheet Molding Compound Production Line, known as SMC2, capacity: 18,500 pounds of molding compound per hour, consisting of:

- (13) One (1) existing permitted calcium carbonate silo to be relocated, equipped with a baghouse, known as SILO1, exhausting through Stacks 25.1, capacity: 150,000 pounds calcium carbonate.
- (14) Two (2) calcium carbonate silos, known as SILO2 and SILO3, each equipped with a baghouse, exhausting through Stacks 25.2 and 25.3, throughput: 2,960 pounds of calcium carbonate per hour each, capacity: 200,000 pounds calcium carbonate, each.
- (15) Two (2) resin mixers, exhausting through Stack 17.1 and/or Stack 17.2, throughput: 8,880 pounds of calcium carbonate, 4,700 pounds of resin, 648 pounds of pigment mixture, 130 pounds of release agent, and 74 pounds of catalyst per hour.
- (16) One (1) sheet molding compound extruder, exhausting through Stack 17.1 and/or Stack 17.2, throughput 14,432 pounds of materials plus 4,070 pounds of chopped fiberglass strands per hour.
- (17) Four (4) sheet molding compound presses, throughput 18,500 pounds of sheet molding compound per hour.
- (18) One (1) hose cleaning re-circulation station, (cold cleaner tank, known as SMC-CC2), exhausting through Stack 17.1 and/or Stack 17.2, capacity: 0.957 pounds of methylene chloride per hour (based on 20 hours per day at 1.75 gallons per day).

# **Door Assembly Line (additional equipment)**

(19) One (1) two-belt sander, known as EU7, with emissions controlled by D2-DC1, exhausting through Stack 20.1.

Therma Tru Corporation Page 6 of 6
Butler, IN 46721-9515 033-14449-00019

Butler, IN 46721-9515 Reviewer: Allen R. Davidson

# D.4.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

(a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the door assembly line adhesive application station shall not exceed 19.3 pounds per hour when operating at a process weight rate of 10.1 tons per hour.

- (b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the door machining station, known as D2-MS1, equipped with a baghouse and cyclone connected in series, known as D2-DC1, shall not exceed 19.3 pounds per hour when operating at a process weight rate of 10.1 tons per hour.
- (c) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the belt sander known as EU-7 shall not exceed 1.37 pounds per hour when operating at a process weight rate of 0.2 tons per hour.
- **(d)** The pounds per hour limitations were calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

 $E = 4.10 P^{0.67}$  where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

# D.4.7 Particulate Matter (PM)

The baghouse and cyclone in series for PM control shall be in operation and control emissions from the door machining station at all times that the door machining any process it controls is in operation.

# D.4.9 Visible Emissions Notations

- (a) Visible emission notations of the <del>door machining station</del> stack 20.1 exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

#### Conclusion

The construction and operation of this emission unit shall be subject to the conditions of the attached Minor Source Modification, No 033-14449-00019.

# **Appendix A: Emissions Calculations**

**Company Name:** Therma Tru Corporation

Address City IN Zip: 108 Mutzfeld Road, Butler, IN 46721-9515

**ID**: 033-14449-00019

Reviewer: Allen R. Davidson

Date: 07/03/01

The following calculations determine the emission limit under 326 IAC 6-3-2:

E = 4.1 \* ( $0.2 \land 0.67$ ) = 1.37 lb/hr

1.37 lb/hr \*

8760 hr/yr /

2000 lb/ton =

5.98 ton/yr

The following calculations determine emissions without controls or limits:

31.20 lb/hr \*

8760 hr/yr /

2000 lb/ton =

136.66 ton/yr

The control device is required to comply with 326 IAC 6-3-2:

136.66 ton/yr \*

1% emitted =

1.36656 ton/yr

(will comply)